

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Kevin B. Dent

Case Number 20-30815-KLP
Chapter 13

Debtor

MOTION TO EXPEDITE HEARING

COMES NOW, Kevin B. Dent, the Debtor, by Counsel, and offer the following in support of his **Motion to Expedite Hearing** on the **Motion for Authority to Sell A Vehicle**:

1. On February 17, 2020 , Debtor filed in the Honorable Court a petition for relief under Chapter 13 of Bankruptcy Code 11 USC § 1301 **et seq.**
2. Debtor seeks to Sell a 2007 Toyota Tundra which is in the Chapter 13 Plan.
3. That an expedited hearing on the Motion *hearing is* necessary for the following reason:
4. **That the Debtor has a buyer willing to purchase the vehicle and time is of the essence.**
5. An expedited hearing is necessary under the circumstances and creditors and parties in interest will not be prejudiced by such expedited hearing being granted, in fact it is their best interest.

WHEREFORE, the Debtor respectfully request this Honorable Court to schedule a hearing to be heard on an expedited basis to consider the **Motion for Authority to Sell A Vehicle** and for such other and further relief as the Court deems proper.

March 11, 2022

RESPECTFULLY SUBMITTED,
Kevin B. Dent

By: /s/: Joseph Massie, III
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CERTIFICATION REGARDING REQUEST FOR EXPEDITED HEARING

In support of the attached request for an expedited hearing as required by Local Rule 9013-1(N), I hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing.
2. I have not created the emergency through any lack of due diligence, and
3. I have made a *bona fide* effort to resolve the matter without hearing.

March 11, 2022

RESPECTFULLY SUBMITTED,
Kevin B. Dent

By: /s/: Joseph Massie, III
Joseph Massie, III
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CERTIFICATE OF SERVICE

I hereby certify that pursuant to Local Rule 9022-1, on March 11, 2022, the foregoing **Motion to Expedite Hearing** has been served on and/or endorsed by all necessary parties.

March 11, 2022

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RESPECTFULLY SUBMITTED

Kevin B. Dent

By /s/: Joseph Massie, III

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Richmond Division**

In re: Kevin B. Dent

Debtor

Case Number 20-30815-KLP
Chapter 13

MOTION TO SHORTEN NOTICE PERIOD

COMES NOW, Kevin B. Dent, ("the Debtor"), by Counsel, and file this Motion to Shorten the Notice Period for the Motion for Authority to Sell a Vehicle pursuant to 11 USC §364(a) and 1304, Federal Rules of Bankruptcy Procedure 4001(c) and 9013, and Local Bankruptcy Rules 9013-1. In support thereof, Debtor respectfully states the following:

Jurisdiction

1. This court has exclusive jurisdiction over this matter pursuant to 28 USC §1334.
2. This proceeding is a core proceeding under 28 USC §157(b)(2)(A)(B)(K) and (O).
3. Venue is proper pursuant to 28 USC §1409.

Facts

4. On February 17th, 2020, the Debtor filed in the Honorable Court a petition for relief under Chapter 13 of Bankruptcy Code 11 USC § 1301 et seq.
5. Debtor seeks to shorten the notice period for the **Motion to Authorize the Sell of a Vehicle** from twenty-one (21) days to twelve (12) days.

WHEREFORE, the Debtor prays that this Court enter an Order shortening the notice period for the **Motion for Authority to Sell A Vehicle.**

March 11, 2022

RESPECTFULLY SUBMITTED,

Kevin B. Dent

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CERTIFICATE OF SERVICE

I hereby certify that pursuant to Local Rule 9022-1, on March 11, 2022, the foregoing **Motion to Shorten Notice Period** has been served on and/or endorsed by all necessary parties.

March 3, 2022

RESPECTFULLY SUBMITTED
Kevin A. Dent

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